

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA	:	CASE NO. 3:18CR158
v.	:	GOVERNMENT’S OMNIBUS
NASER ALMADAOJI,	:	TO DEFENDANT’S PRETRIAL
Defendant.	:	MOTIONS

The United States, through the undersigned counsel, hereby submits this omnibus response to the following pretrial motions filed by Defendant Naser Almadaoji: Motion for Disclosure of the Existence and Substance of Promises of Immunity, Leniency or Preferred Treatment (ECF. No. 34); Motion for Production of 404(b) Material (ECF No. 35); Motion for Early Jencks Material (ECF No. 36); and Motion to Compel Government to Provide Defendant with Exhibit and Witness List Before Trial (ECF No. 37).

After consultation, the parties agree that the United States will produce the following materials at least seven days prior to trial: (1) *Jencks* statements of government witnesses; (2) information required to be disclosed under *Giglio v. United States* with respect to government witnesses; and (3) the United States’s witness and exhibit lists. The parties also agree that the United States will provide notice to the defendant at least 14 days prior to trial of any Fed. R. Evid. 404(b) material that the United States intends to introduce at trial.

The parties agree that the United States’s witness and exhibit lists are subject to change up until the commencement of trial, and that the United States will apprise the defendant of any changes made to the initial witness and exhibit lists provided to defendant. The parties also

agree and recognize that certain disclosure obligations, such as those under *Brady*, *Giglio*, and *Jencks*, are continuing obligations, that discoverable information is sometimes learned of by the parties after deadlines, and that the parties will comply with their respective discovery and disclosure obligations even after these agreed-to deadlines.

Respectfully submitted,

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s/ Dominick S. Gerace

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CERTIFICATE OF SERVICE

This is to certify that on this 31st day of March, 2020, I served upon defense counsel, James P. Fleisher, Esq., a copy of the foregoing by electronic delivery through the Court's CM/ECF system.

s/ Dominick S. Gerace

DOMINICK S. GERACE (OH 0082823)

Assistant United States Attorney